UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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MARIA ESCALANTE,                            *
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              Plaintiff,                     *
                                            *
v.                                          *    CIVIL ACTION NO. 04-30174-KPN
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CENTER FOR HUMAN DEVELOPMENT,               *
INCORPORATED,                               *
                                            *
              Defendant.                     *
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JOINT STATEMENT AND PROPOSED PRETRIAL SCHEDULE

1.   Discovery: The Parties confirm their obligation to limit discovery set forth in Fed. R. Civ. P. 26(b), and they wish to conduct discovery in phases. The parties propose that the first phase be limited to developing information needed for a realistic assessment of the case and a determination as to whether dispositive motions would be appropriate, and the second phase directed at experts, if any, and otherwise developing the case for trial. The proposed schedule is as follows:

   A.   All non-expert discovery completed no later than **September 1, 2005**.

   B.   Rule 56 Motions: Filed no later than **October 15, 2005**.

2.   Expert Discovery:

   A.   If no Rule 56 Motions are filed, Plaintiff to disclose experts, if any, by **October 30, 2005**, and Defendant to disclose experts by **November 30, 2005**. All expert depositions concluded by **January 30, 2006**.

   B.   If any Rule 56 Motions are filed and case not disposed of by the same, Plaintiff to disclose experts within one month after date of decision on said motion, and Defendant to disclose experts within one month after Plaintiff discloses experts. All expert depositions concluded by two months after.

3.   Local Rule 16.1 Certifications: **To be submitted separately**.

Respectfully Submitted,   Respectfully Submitted,

 /s/ Amy B. Royal   /s/ Michael O. Shea
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Dated: February 8, 2005